

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

JUL 01 2011

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY fm DEPUTY CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESUS CHAVEZ,

Defendant.

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No. 11-3330-G  
EP-11-CR-

GOVERNMENT'S MOTION TO DETAIN DEFENDANT  
WITHOUT BOND AND MOTION FOR CONTINUANCE

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. Defendant is charged with a violation of the Controlled Substances Act which carries a term of imprisonment of over ten (10) years.
2. Defendant was arrested pursuant to a conspiracy involving over 500 pounds of Marijuana.
3. Defendant has a prior criminal history.
4. There are no conditions or combination of conditions which will reasonably assure the safety of the community should Defendant be released on bond.
5. There are no conditions or combination of conditions which will reasonably assure the appearance of Defendant at future court settings.

The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

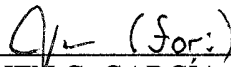
July 1, 2011

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

JOHN E. MURPHY  
UNITED STATES ATTORNEY

BY:

 (for:)  
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